

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.
MARGARITA VALLEJO

Case:2:10-mj-30447
Judge: Unassigned,
Filed: 10-26-2010 At 10:07 AM
CMP: Margarita Vallejo (jj)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 22, 2010 in the county of Washtenaw in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

21 U.S.C. Sections 841(a)(1), 846

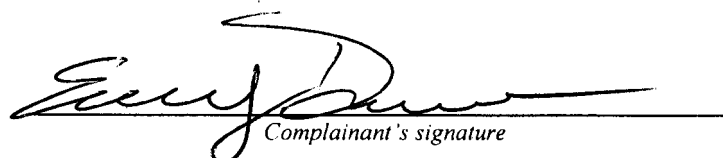
Offense Description

Conspiracy to possess with intent to distribute over 5 kilograms of a controlled substance that is cocaine.

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.


Complainant's signature

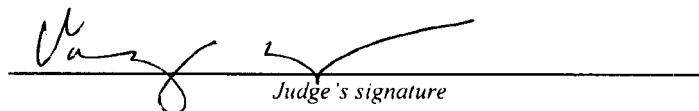
Special Agent Edward Donovan, DEA

Printed name and title

Sworn to before me and signed in my presence.

Date: OCT 26 2010

City and state: Detroit, MI


Judge's signature

Virginia M. Morgan, United States Magistrate Judge

Printed name and title

AFFIDAVIT

I, Edward Donovan (hereafter referred to as affiant) being duly sworn deposes and states the following:

1. Your affiant is a duly sworn Special Agent of the United States Drug Enforcement Administration (DEA), having been assigned as such since 1998 and having served as a Special Agent within the Detroit Field Division since May 1999. Prior to employment with the DEA, I was employed as a Police Officer in the State of Illinois for approximately 6 years. During this time your affiant has conducted and has been involved in conducting numerous investigations relating to the manufacture and distribution of marijuana, cocaine, and other controlled substances. Your affiant has attended schools and has been instructed in many aspects of narcotics investigations and is familiar with the laws promulgated under Title 21 of the United States Code.
2. Based on the facts set forth throughout this affidavit, your affiant believes that probable cause exists to believe that Margarita VALLEJO knowingly and intentionally Conspired to Possess with Intent to Distribute, and to Distribute Controlled Substances, including five kilograms or more of a mixture or substance containing cocaine, a violation of Title 21 USC 841(a)(1) 846.
3. On October 22, 2010, while conducting roving patrol on west bound Interstate 94, in Calhoun County Michigan, Michigan State Police Trooper Denise Rule conducted a vehicle stop on a 2010 Toyota, Avalon bearing Illinois license plate A614252. A registration check revealed that the Toyota is registered to the Hertz Rental Car Company. Officers later determined that VALLEJO was to sole renter of the vehicle.
4. During the vehicle stop Trooper Rule met with Margarita VALLEJO, the driver and sole occupant of the vehicle. During the traffic stop VALLEJO granted Trooper Rule consent to search the vehicle. As a result of the search, Trooper

Rule located a suitcase that contained twelve brick shaped objects, each weighing approximately one kilogram, that contained an off- white powder like substance. A preliminary field test of five of the twelve brick shaped objects revealed a positive indication for the presence of cocaine.

5. Additionally, Trooper Rule located two additional suitcases in the vehicle, which contained forty four heat sealed bags that contained United States Currency. According to ledgers that were enclosed with the U.S. currency, the estimated amount of currency inside the suitcases is \$2 million dollars.
6. During a post Miranda statement VALLEJO admitted that she lives in Lahabra, California, and that on October 18, 2010, she flew into Chicago, Illinois, rented the Toyota Avalon from Hertz Rental Car Company, and drove to Ann Arbor, Michigan. VALLEJO stated that the purpose of the trip was to pick up money and transport the money to Chicago, Illinois. VALLEJO stated that a male know only as Elsholo, agreed to pay VALLEJO between \$6,000 and \$7,000 for transporting the currency. VALLEJO admitted that she has made at least three similar trips within the last couple months.
7. When asked where the currency came from, VALLEJO responded "That she doesn't ask and does not know". VALLEJO stated that on Friday October 22, 2010, a black male arrived at her hotel in Ann Arbor, Michigan, placed the suitcases into the trunk of the Toyota and closed the trunk. VALLEJO stated that she departed and traveled towards Chicago, Illinois shortly after the suitcases arrived. VALLEJO explained that she anticipated receiving a telephone call 3 to 4 hours after leaving Ann Arbor, Michigan, and that the person calling her would tell her where to go in Chicago, where to stop, and what to do with the suitcases.
8. Based on experience and training, affiant knows that large scale drug traffickers very often pay drivers, or individuals commonly referred to as couriers to transport drugs and money derived from narcotic sales, from one location to another. Your affiant knows from experience and training that drug traffickers

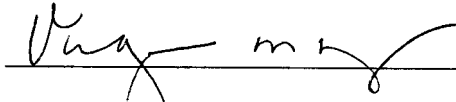
very often utilize individuals that are less likely to be suspected by law enforcement in an effort to protect their drugs and/or money from being seized from law enforcement.

9. Therefore, your affiant believes that probable cause exists to believe that Margarita VALLEJO, knowingly and intentionally Conspired to Possess with Intent to Distribute and to Distribute Controlled Substances, including five kilograms or more of a mixture or substance containing cocaine, a violation of Title 21 USC 841(a)(1) 846.



Edward Donovan
Special Agent
Drug Enforcement Administration

Virginia M. Morgan
Subscribed to and sworn before me.
On this 26th day of October 2010.



United States Magistrate Judge
Eastern District of Michigan